UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION – DETROIT

| IN THE MATTER OF: | | CHAPTER 13 |
|-------------------|---|------------------------|
| Torri A Scruggs | | CASE NO. 20-42825-TJT |
| , Debtor(s). | | JUDGE THOMAS J. TUCKER |
| | / | |

TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES, the Chapter 13 Trustee, Tammy L. Terry, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E.D. Mich. L.B.R. 3015-3(a) and 11 U.S.C. §1307(c)(5) as follows:

- 1. The Trustee reserves the right to object to any of the debtor's budgetary expenses if the plan is ever amended to propose less than 100% to class nine general unsecured creditors.
- 2. The value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate of the debtor(s) were liquidated under Chapter 7, contrary to 11 U.S.C. 1325(a)(4).

WHEREFORE, the Chapter 13 Trustee requests this Honorable Court deny confirmation of the debtor's (s') Chapter 13 Plan and dismiss this case pursuant to 11 U.S.C. §1307(c)(5).

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT Tammy L. Terry, Chapter 13 Trustee

/S/ TAMMY L. TERRY (P-46254)

July 22, 2020

Chapter 13 Standing Trustee
/s/ KIMBERLY SHORTER - SIEBERT (P-49608)
/s/ MARILYN R. SOMERS-KANTZER (P-52488)
Staff Attorneys
535 Griswold, Suite 2100
Detroit, MI 48226
(313) 967-9857
mieb_ecfadmin@det13.net

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION - DETROIT

| IN | THE | MA | TTER | OF: |
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CHAPTER 13 CASE NO. 20-42825-TJT JUDGE THOMAS J. TUCKER

Torri A Scruggs , Debtor(s).

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CERTIFICATE OF MAILING

I hereby certify that on July 22, 2020, a copy of **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** was electronically filed with the Clerk of Court, served electronically to the debtor's(s') attorney and a copy of same deposited in the U. S. Mail to the debtor (s) at the address as it appears below.

/s/ Terri Dooms

For the Office of the Chapter 13 Trustee-Detroit 535 Griswold, Suite 2100 Detroit, MI 48226 (313) 967-9857 mieb_ecfadmin@det13.net

Torri A ScruggsTorri A Scruggs 42127 E. Edward Dr. Clinton Township MI 480380000

THAV GROSS P C 30150 TELEGRAPH RD SUITE 444 BINGHAM FARMS MI 480250000